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December 2, 2014

Hon. Shira A Scheindlin  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: US v. Edward Alexis Medrano  
13 Cr 242 (SAS)

Dear Judge Scheindlin:

I am counsel for Edward Alexis Medrano, who was sentenced yesterday to a term of 75 months' imprisonment. Without objection from the Government, the defense respectfully requests that the judgment specifically state that the District Court intends to credit Mr. Medrano for:

- the 148 days that elapsed between his indictment (April 1, 2013) and arrival in the Southern District of New York (August 16, 2013), and,
- the 473 days that elapsed between his presentment in the Southern District of New York (August 16, 2013) and imposition of his federal sentence (December 1, 2014).

That could be accomplished by stating that the sentence is 75 months' imprisonment, but that the District Court intends that time should count since April 1, 2013 – the date of the federal indictment. If necessary, such a reduction could be achieved pursuant to a reduction under USSG § 5G1.3.

Mr. Medrano has been in continuous custody since he was remanded at an appearance in Bronx County Supreme Court on December 9, 2011. Under Bronx County indictment # 1308 2010, he pleaded guilty to Criminal Sale of a Controlled Substance, 3<sup>rd</sup> degree, and was sentenced on July 12, 2012 to a term of three years' imprisonment. (PSR ¶ 79). That case was relevant conduct, and Mr. Medrano was serving that term of imprisonment when he was indicted on April 1, 2013. (cover page of federal indictment attached as Exhibit A).

Mr. Medrano did not arrive in the Southern District of New York until August 16, 2013. Below is the docket sheet entry reflecting the date of Mr. Medrano's presentment:

Minute Entry for proceedings held before Magistrate Judge Ronald L. Ellis:  
Initial Appearance on disposition sheet as to Edward Alexis Medrano held on 8/16/2013. Deft present with atty Don Yanella. AUSA Amy Lester present. Detention on consent without prejudice. Next conference set before District Judge Scheindlin on 9/9/2013 at 4pm. Next speedy trial time excluded under 18 USC 3161(h)(7) until 9/9/2013. (jw) (Entered: 08/19/2013)

Although the District Court declined to reduce Mr. Medrano's sentence in order to credit him for a far greater amount of time that he served in state custody for relevant conduct (approximately 4 months in 2010 as well as all time since his remand on December 9, 2011), we request that this more modest reduction of time be explicitly granted.

Sincerely,

/s/

Donald J. Yannella, Esq.

# EXHIBIT A

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

v. :

MARK ALLIE, :

a/k/a "Capone," :

JOSE VERA, :

a/k/a "JB," :

JONATHAN SAMBULA, :

a/k/a "Bula," :

GUILLERMO ORTIZ, :

a/k/a "Gordo," :

MICHAEL ORTIZ, :

a/k/a "Fatz," :

JAMAINE TAYLOR, :

a/k/a "Maine," :

RACHEL DIAZ, :

a/k/a "Gotti," :

CHRISTIAN FABRE, :

a/k/a "Blue," :

DAMON GROOMS, :

a/k/a "Mo," :

ROBERT HENDERSON, :

a/k/a "Cain," :

NOEL FELICIANO, :

a/k/a "Chuckie," :

a/k/a "Bebo," :

JOSE AVILES, :

a/k/a "Abel," :

JONATHAN MIRABAL, :

a/k/a "Jose Lorenzo," :

a/k/a "JJ," :

ANDRE CUNNINGHAM, :

a/k/a "Drizz," :

HARANAKK DINGLE, :

a/k/a "Pookie," :

LUIS GUZMAN, :

a/k/a "Fro," :

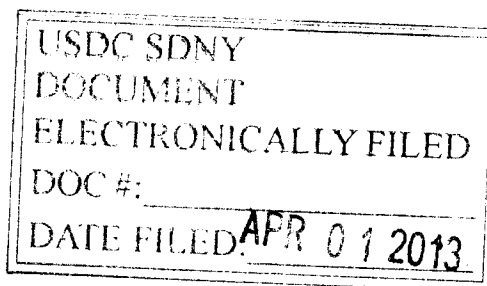
ZOA BRIGGS, :

a/k/a "Blaze," :

ROBERT TORRES, :

DARNELL HOPKINS, :

a/k/a "D," :



SEALED  
INDICTMENT

13 Cr.

13 CRIM 242

JUDGE SCHEINDLIN

JELFREY GUTIERREZ, :  
a/k/a "Dez," :  
a/k/a "Sati," :  
JASON LEWIS, :  
MAX JORDAN, :  
a/k/a "Maxi," :  
EDWARD ALEXIS MEDRANO, :  
a/k/a "Lex," :  
LUZ FIGUEROA, :  
a/k/a "Destiny," :  
a/k/a "Lucy," :  
FNU LNU, :  
a/k/a "Kat" :  
MICHAEL McDUFFIE, :  
DAVID WILSON, and :  
STEVE RAMSNAMY, :  
:   
Defendants. :  
:   
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COUNT ONE

The Grand Jury charges:

1. From approximately in or about 2008, up to and including on or about April 2, 2013, in the Southern District of New York, MARK ALLIE, a/k/a "Capone," JOSE VERA, a/k/a "JB," JONATHAN SAMBULA, a/k/a "Bula," GUILLERMO ORTIZ, a/k/a "Gordo," MICHAEL ORTIZ, a/k/a "Fatz," JAMAINE TAYLOR, a/k/a "Maine," RACHEL DIAZ, a/k/a "Gotti," CHRISTIAN FABRE, a/k/a "Blue," DAMON GROOMS, a/k/a "Mo," ROBERT HENDERSON, a/k/a "Cain," NOEL FELICIANO, a/k/a "Chuckie," a/k/a "Bebo," JOSE AVILES, a/k/a "Abel," JONATHAN MIRABAL, a/k/a "Jose Lorenzo," a/k/a "JJ," ANDRE CUNNINGHAM, a/k/a "Drizz," HARANAKK DINGLE, a/k/a "Pookie," LUIS GUZMAN, a/k/a "Fro," ZOA BRIGGS, a/k/a "Blaze,"